

EXHIBIT 3

UNITED STATES DISTRICT COURT
IN THE WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

MARIA ALONSO and JAMES SAYLOR,

Plaintiffs

vs.

Case No. 1:14-cv-0400

Hon. Paul L. Moloney, Chief Judge

CITY OF BATTLE CREEK, DAVID WALTERS,
SUSAN BEDSOLE and JAMES BLOCKER,

Jointly and severally,

Defendants.

AFFIDAVIT OF JACKIE HAMPTON

STATE OF MICHIGAN)
)ss.
CALHOUN COUNTY)

I, Jackie DeWon Hampton, hereby state under penalty of perjury as follows:

1. My name is Jackie DeWon Hampton.
2. I have personal knowledge of the facts stated in this affidavit and if called to testify I could testify truthfully and competently to the facts stated in this affidavit.
3. I served as a police officer for the City of Battle Creek for 27 years and 11 months.
4. I served as police chief for the Battle Creek Police Department from February 2010 until my retirement on January 31, 2014.
5. During the time that I served with the Battle Creek Police Department, police officers with the BCPD, including non-represented officers, were just cause employees.

6. As just cause employees, BCPD officers, including non-represented officers, could not be discharged from employment "at will" and could only be discharged from employment for just cause.

7. During the time that I served as police chief for the Battle Creek Police Department, James Saylor reported to me as Deputy Chief and Maria Alonso reported to me as Police Inspector.

8. Over the years, human resources director Russ Claggett and City manager Ken Tsuchiyama stated to me that non-represented police department personnel were just cause employees.

9. I assured Mr. Saylor and Ms. Alonso on numerous occasions that they were just cause employees of the Battle Creek Police Department.

10. Based on my personal knowledge of the rules, policies and practices of the Battle Creek Police Department, all police department personnel, including non-represented personnel, could reasonably expect that their employment with the department could only be terminated for just cause.

Jackie Hampton Date

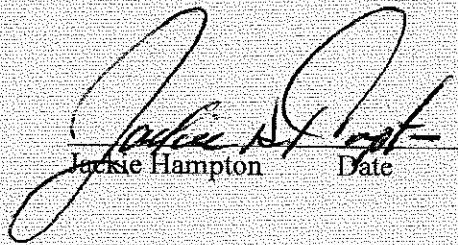
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Jackie Hampton Date 7/4/14